


EXHIBIT # C

From: Judd Burstein jburstein@buraw.com 

Subject: RE: Motion to file a sur-reply

Date: Apr 18, 2022 at 6:35 PM

To: Tyrone Blackburn 

Cc: Peter B. Schack pschack@buraw.com, Emily F. Nestone EFnestone@buraw.com, Victor Weberman VWeberman@buraw.com

Tyrone:

While my Reply Declaration made clear that I did not know whether Steven's and his wife's Declarations were true and that the substance of your accusations about Steven's conduct (other than the false accusation that I was in a conspiracy with him) are irrelevant to my motion, your two emails to me certainly raise significant concerns in my mind about the bona fides of their Declarations. I therefore am seriously considering asking permission (presumably with your consent) to file an amended Reply Declaration without the Declarations as exhibits, and I ask that you hold off until Thursday before asking for permission to file a sur-reply. If I conclude that the Declarations (or parts thereof) are materially unreliable or false (which is very different than not knowing whether they are true), I will be proactive in alerting the Court and removing them from my reply papers. However, I need a little more time to consider the appropriate course of action. To that end, it would be very helpful to me if you would provide me with any other evidence in your possession which would help me evaluate whether I should withdraw the Declarations. Since you are prepared to file the sur-reply with that evidence, I see no harm in you providing it to me now. Further, I ask that you provide me with the date of the text between you and Steven, as well as any other texts that day about the YouTube post (such as the texts immediately preceding what you sent me.)

Judd Burstein
Judd Burstein, P.C.
260 Madison Avenue
New York, New York 10016
(212) 974-2400 (Main Number)
(917) 687-2981 (Direct)

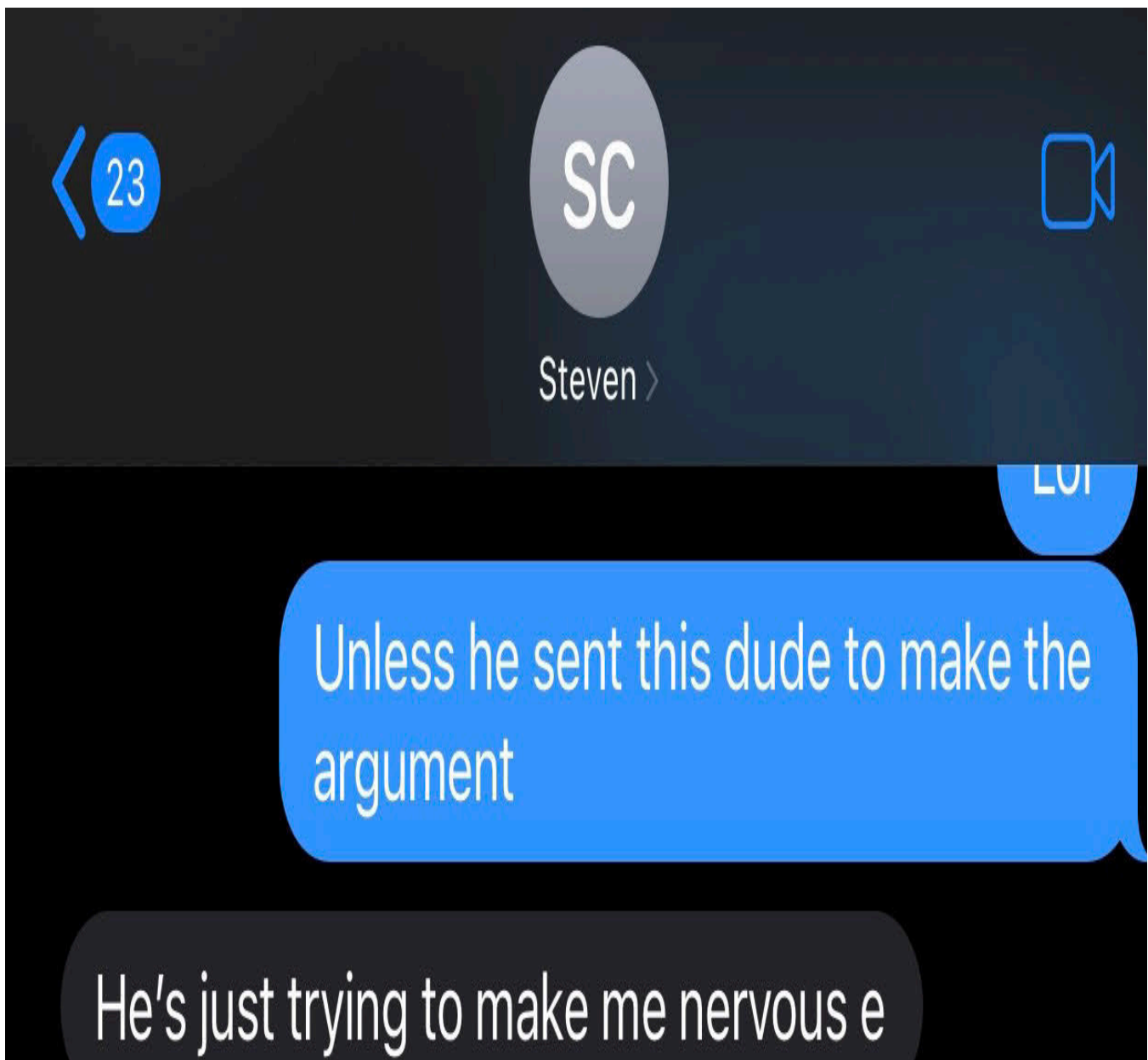
**PLEASE EXCUSE TYPOS AND GRAMMATICAL ERRORS, AS I AM
A TERRIBLE TYPIST AND AN EVEN WORSE PROOFREADER.**

From: Tyrone Blackburn [REDACTED]
Sent: Monday, April 18, 2022 9:11 AM
To: Judd Burstein <jburstein@burlaw.com>
Subject: Re: Motion to file a sur-reply

While you do your investigation you may want to ask Steven about this text message he sent me last fall admitting to writing the YouTube post. I forgot I had this email from Steven or I would have definitely provided it in my opposition. I will use it in my sur-reply along with other evidence to show that Steven Gordon is a manipulative sneaky liar.

Regards,

Tyrone A. Blackburn, Esq.
T. A. Blackburn Law, PLLC
[REDACTED]



Haha very possible

But I think he just doesn't like the fact that we're not afraid of him

So he's trying everything

He knows we don't give a 

Haha yeah I know. Whatever. I'm assuming whoever gave him the tip made it out to be bigger than what it was

Ciar is a serious ride or die! Lmfao

Haha I wrote her post

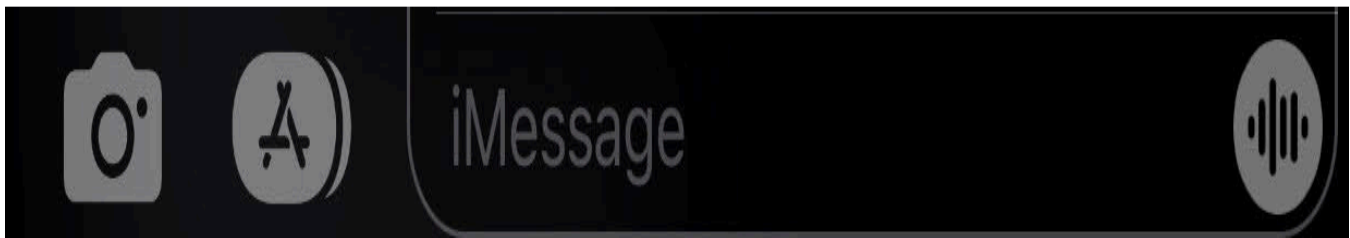
Shhh

Don't tell anyone

Haha

I know I know 🤔🤔🤔

Subject



On Apr 18, 2022, at 8:30 AM, Judd Burstein <jburstein@burlaw.com> wrote:

Tyrone:

Obviously, I do not want to harm Steven anymore beyond what you have done to him. But I need another day to sort this out, including to investigate it's bona fides

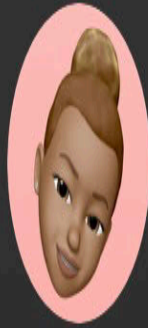
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**PLEASE EXCUSE TYPOS AND GRAMMATICAL
ERRORS, AS I AM A TERRIBLE TYPIST AND AN EVEN
WORSE PROOFREADER.**

From: Tyrone Blackburn [REDACTED]
Sent: Monday, April 18, 2022 7:35 AM
To: Judd Burstein <jburstein@burlaw.com>
Subject: Re: Motion to file a sur-reply

Tyrone A. Blackburn, Esq.
T. A. Blackburn Law, PLLC.
Phone: 347-342-7432
[REDACTED]





Cíardoné >

Wednesday 6:30 PM

I've been crying all day, I'm so stressed. Steve is threatening to use what you wrote in the declaration against me in the divorce to get money from me. Can you please give me a call so we can come up with a plan. Judd is filing soon.

[REDACTED]

On Apr 18, 2022, at 7:33 AM, Tyrone Blackburn
<tblackburn@tablackburnlaw.com> wrote:

Judd,

This evening I will submit a letter to the court to request leave to file a Sur-reply to your reply brief for your sanctions motion. In your reply brief, you introduced new and demonstrably false Declarations that require a response. In your reply brief, you provided the court with declarations from Steven Gordon, and "Mrs. Gordon." Although there were several issues with the Mrs. Gordon declaration, for the purposes of this email I will focus on three issues. 1. Ciardone Franklin sent me a text message letting me know that Steven Gordon had threatened her in exchange for her providing him with a written statement. I am unsure if you were made aware of this, but nonetheless, I have attached a screenshot of the text message I received from Ciardone concerning this fact. 2. On March 31, 2022, Ciardone was my date to a Gala in NYC. She did not express any "anger" regarding my declaration, and what she shared with me regarding Mr. Gordons drug addiction. So, Mr. Gordon's assertion in the March 30th email to you that his wife was "angry," is a lie. 3. Ciardone Franklin is a licensed attorney, and her mother Allyson Franklin is a licensed attorney. It is highly unlikely that Ciardone, with the advice of her mother, would provide a demonstrably false declaration to a Federal Court concerning facts that I can confirm by reproducing the two-hour-long conversation.

[REDACTED]

I have no desire to disclose the contents of Ciardone and my conversation. But it is important to correct the record especially if Steven fabricated the "Mrs. Gordon" declaration (which I think he did since he fabricated the youtube post).

I am requesting that you withdraw Steven Gordon and the Mrs. Gordon's Declarations or provide me with dates for a briefing schedule so I can file a sur-reply.

Regards,

Tyrone A. Blackburn, Esq.
T. A. Blackburn Law, PLLC.
Phone: 347-342-7432
TABlackburnlaw.com